

CAVENDO PRIVACY POLICY

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1 INTRODUCTION

Cavendo Asset Management, corp. ID no. 559067-7687, (hereinafter "Cavendo", "we" or "us") cares about the individual's privacy and makes sure that the personal data is processed in a safe, correct and legal manner. Cavendo has adopted this privacy policy to inform you about how we process your personal data. If you in any way submit personal data to Cavendo, we encourage you to read this policy first.

Please note that we do not process personal data from the users of our website www.cavendo.se. We do not use tools or techniques (e.g., cookies) that allows us to gather personal data while you are visiting our website.

2 CONTACT DETAILS AND RESPONSIBILITY FOR THE PERSONAL DATA

The data controller for the personal data processing covered under this privacy policy is Cavendo. You are welcome to contact us at any time if you have any questions regarding our processing of your personal data. You can contact us by e-mail at gdpr@cavendo.com or by post at Birger Jarlsgatan 32b, 114 29 Stockholm.

3 THE PROCESSING OF PERSONAL DATA

3.1 Asset management

Which persons personal data do we process?

Natural persons who represents or are employed by a customer of Cavendo.

Natural persons who represents or are employed by a supplier/partner/customer/tenant of Cavendo's customers.

What personal data do we process?

We normally process name, professional title, employer/client, contact information, residence, information in communication (e-mail, letters) and in contracts, project documentation and meeting notes.

How do we collect personal data?

From you, or your employer/client.

Why and on what legal basis do we process your personal data?

When providing asset management services, Cavendo come into contact with, and process, personal data. Our purposes for processing the data depends on your role and the relationship we have with you.

a) You are a representative or employee at one of Cavendo's customers, or at a supplier/partner/customer/tenant of Cavendo's customers.

Cavendo will process your personal data in order to communicate with you as a representative of the company you represent and to inform you about our business and our services. The processing is based on Cavendo's *legitimate interest* of creating a business relation with you or the company you represent.

Based on Cavendo's *legitimate interest* to enter into and fulfil contracts with our customers we process personal data in order to:

- Enter into agreements with you or the company you represent. This includes confirming your identity and your right to represent the company,
- document, carry out and administer assignments, projects and contractual relationships. This includes communicate with you, administer and hold meetings, report and follow-up on the work and otherwise handle issues related to our assignments/projects; and
- invoice and manage payments.

In digital video conferences, video- and audio recordings are processed if you have activated your webcam and microphone. All attendees of the video conference can see you and access your name. This processing is carried out in real time and is never recorded.

Based on Cavendo's *legitimate interest* to maintain and develop our business relation with the company you represent your personal data will be used to communicate with you as a representative of the company and inform about our business and services.

Where applicable, your personal information may be stated at supporting documents that we need to save for accounting purposes. The processing of personal data is then carried out on the basis of a *legal obligation* that we are subject to.

Where applicable, your personal data may need to be processed in order for us to assert, investigate, respond or defend ourselves against a legal claim. For example, in the context of a dispute with your employer. The processing is based on our *legitimate interest* to handle and defend legal claims, as well as to safeguard our rights provided by law or agreement.

b) You are a representative or employee at a potential supplier, tenant, partner, as well as authorities and other stakeholders

Personal data is processed to create, maintain and strengthen the relationship with each municipality, potential supplier, potential partner or other stakeholder (e.g. a bank, investor, or tenant) to the type of project/asset management that Cavendo carries out and that may be relevant to hire or mediate contact regarding.

The processing is based on Cavendo's *legitimate interest* to create and maintain a network of stakeholders to the type of property being managed/project carried out, as well as to be able to offer our customers good partners.

How long do we store your personal data?

Cavendo will process your personal data for the duration of our business relations with you or the company you represent, however, for a maximum of two (2) years from the time we were last in contact with each other due to our business relation.

Personal data being processed within a specific project can be stored for three (3) years from the time the customer assignment was completed. If we deem that the data is necessary to defend legal claims, show that we have complied with a legal obligation, or to protect our legal and contractual rights, the storage period will be extended to the required time but not more than ten (10) years.

Personal data being processed for accounting purposes are stored for as long as the law requires, which is 7+1 years.

3.2 Suppliers, partners, authorities

Which persons personal data do we process?

Natural persons who represents or are employed by a supplier or partner of Cavendo, or an authority that Cavendo is in contact with.

What personal data do we process?

We normally process name, professional title, employer/client, contact information, residence, information in communication (e-mail, letters) and in contracts, project documentation and meeting notes.

How do we collect personal data?

From you or the organisation you represent.

Why and on what legal basis do we process your personal data?

In connection with the business relation between Cavendo and the organisation you represent we will process personal data in order to:

- Enter into agreements with you or the company/organisation you represent. This includes confirming your identity and your right to represent the company/organisation,
- administer the relationship including communicate with you as a contact person, administer meetings and follow up on the matter/delivery,
- make use of the services or goods purchased in the intended manner, e.g. for the purpose of receiving delivery of the products, use customer support including complaints; and
- handle invoices and payments.

In digital video conferences, video- and audio recordings are processed if you have activated your webcam and microphone. All attendees of the video conference can see you and access your name. This processing is carried out in real time and is never recorded.

The processing is based on our *legitimate interest* of administer the contractual relationship, fulfil our contractual obligations and safeguard our contractual rights.

As for employees of authorities, your information is processed in order to (i) communicate with the authority e.g. in specific cases/matters, and (ii) report correctly and otherwise fulfil obligations/take measures necessary to comply with law or safeguard legal rights or for the case in question.

Where applicable, your personal information may be stated at supporting documents that we need to save for accounting purposes. The processing of personal data is then carried out on the basis of a *legal obligation* that we are subject to.

Where applicable, your personal data may need to be processed in order for us to assert, investigate, respond or defend ourselves against a legal claim. For example, in the context of a dispute with your employer. The processing is based on our *legitimate interest* to handle and defend legal claims, as well as to safeguard our rights provided by law or agreement.

How long do we store your personal data?

Cavendo will store your personal data for the duration of our business relations or case with you or the company/organisation you represent and for a time of three (3) years thereafter. If we deem that the data is necessary to defend legal claims, show that we have complied with a legal obligation, or to protect our legal and contractual rights, the storage period will be extended to the required time but not more than ten (10) years.

Personal data being processed for accounting purposes are stored for as long as the law requires, which is 7+1 years.

3.3 Other contacts

Which persons personal data do we process?

Natural persons contacting Cavendo, for example by e-mail.

What personal data do we process?

We normally process name, professional title, employer/client, contact information, residence and information in communication (e-mail, letters).

Why and on what legal basis do we process your personal data?

Communication in connection with inquiries

If you contact us by letter or e-mail, we must collect and process personal data. The purpose of the processing is to handle and answer to inquiries related to our business. The processing is based on our *legitimate interest* in answering incoming questions and conducting our business. Certain requests may also be processed for our *legitimate interest* in complying with and demonstrating that we comply with the laws and regulations to which we are subject, such as issues relating to the exercise of data subject rights under data protection law.

How long do we store your personal data?

Communication in connection with inquiries is normally deleted six (6) months after the inquiry being answered. If we deem that the data is necessary to defend legal claims, show that we have complied with a legal obligation, or to protect our legal and contractual rights, the storage period will be extended to the required time but not more than ten (10) years.

3.4 Recruitment

Which persons personal data do we process?

Natural persons applying for employment or internship at Cavendo.

What personal data do we process?

The information you provide to us in connection with the application usually: Name, social security number, address and contact information, picture, education, professional experience, grades, other skills and qualities, information provided in your personal letter, all information in communication such as e-mail. In addition, we keep internal notes in connection with interviews.

Why and on what legal basis do we process your personal data?

Your personal data needs to be processed in order for us to be able to recruit employees for the business. Within the framework of the recruitment process, your data is processed for the following purposes:

- Handling the recruitment process, including administer applications and book interviews,
- evaluate and assess the candidate in relation to the current position,
- communicate with the candidate and provide notice of employment, and
- If you have submitted a spontaneous application (i.e., not to a specific position), your application will be saved to inform and to consider your application the next time we are looking to hire.

Our assessment is that it is in both Cavendo's and the jobseeker's interest that the personal data is processed for recruitment purposes. The processing is based on our *legitimate interest* to recruit co-workers and simplify/streamline the recruitment process.

Furthermore, we process your personal data for the purpose of defending and responding to legal claims but also to safeguard our legal rights, for example in the context of discrimination cases, or an employment law case such as a matter of preferential rights or re-employment. The information is stored for two (2) years for this purpose.

How long do we store your personal data?

Your personal data is stored for six (6) months, calculated from the last job you applied for. Your data is thus saved until the job you applied for has been transferred to permanent employment. If you have given your consent to the processing, the data is instead saved for two (2) years calculated from when you last gave your consent.

4 RECEIPT AND STORAGE OF PERSONAL DATA

Your personal information may be disclosed to and processed by third parties. Namely:

- employees or consultants to us or our group companies,
- service providers such as server- and data storage companies, e-mail and communication modules and other IT services or software providers,
- sometimes we may need to share information with authorities and courts, as well as legal advisers if required to defend or safeguard a legal claim or if we are required by law,
- our clients or other supplier to the client when it is necessary for Cavendo to be able to carry out its assignment, and
- where applicable, banks, insurance companies, authorities, and debt collection companies.

We only share your information with partners we trust and if we, when needed, have entered into the necessary data transfer agreement or personal data processing agreement. In some cases, personal data may be disclosed to a party outside the EU or the EEA. We currently have subcontractors based outside the EU/EEA whereby your personal data may be processed in a third country. We only share your personal data with such parties if we have taken necessary safety precautions (e.g. entered into EU's standard contractual clauses) to assure an adequate level of protection.

5 YOUR RIGHTS UNDER GDPR

Below is an overall description of the rights you have under the General Data Protection Regulation. You exercise your rights by contacting Cavendo, which is free of charge.

Upon receipt of your request, Cavendo will make an assessment of the request to determine if it is justified. All rights set forth below are not absolute and exceptions may be made.

Access to personal data

You are entitled to request access to the personal data that we process about you along with information about how it is being processed and any recipients of the data. Cavendo, as data controller, will provide you with a free copy of the personal data being processed.

Correction of incorrect personal data

You are entitled to request rectification of incorrect personal data. Furthermore, you are entitled to supplement incomplete personal data.

Erasure of personal data

In some cases, you are entitled to request erasure of your personal data if it is no longer necessary for the purpose for which it was collected, if there is no legal basis for its processing or if our processing is based on your consent. However, there may be legal requirements, contractual relationships or compelling legitimate interests that prevent us from deleting your personal data.

Restriction of processing

You are in some cases entitled to request that the processing of your personal data shall be limited until incorrect data is rectified or until an objection from you has been investigated, if the data is no longer necessary for the purpose for which it was collected but you object to erasure of it and request that the processing is instead restricted, or if Cavendo is no longer in need of the personal data but you need it to establish, exercise or defend legal claims.

Right to object

You have the right to object at any time to the processing of your personal data if the legal basis for the processing consists of a balance of interests. You also have the right to object at any time to the processing of your personal data if the data is processed for direct marketing.

Transfer your data/data portability

You are entitled to receive the personal data that you have provided to us in electronic form and, if technically feasible, have the data transferred to another data controller. This right applies if we are processing your personal data on the basis of your consent or by fulfilling a contract with you.

Withdrawal of your consent

If we are processing your personal data on the basis of your consent, you may withdraw this consent at any time. Your withdrawal does not affect the legality of our processing up to the point of your withdrawal.

Complaints of the processing

If you are not satisfied with how we are processing your personal data we ask that you contact us, see our contact information in Section 2. You also have the right to lodge a complaint with a supervisory authority, which in Sweden is the Swedish Authority for Privacy Protection (www.imy.se), Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm.

Cavendo undertakes no personal data processing that involves automatic decision-making, including profiling.

6 THE USE OF EMAIL

Please note that e-mail without encryption can pose risks regarding security and confidentiality. An e-mail is comparable to a postcard. Therefore, we ask of you not to disclose information by e-mail that you do not wish that a third party gets access to. Never provide sensitive information or information that may be used for undesirable purposes by a third party.

Cavendo always has standard encryption enabled for e-mail communication, but this is not always sufficient. In the event that we deem the specific information cannot be sent with standard encryption and e-mail, we will, if possible, add additional encryption or use another method of communication.

7 CHANGES TO THE PRIVACY POLICY

Cavendo reserves the right to change and update this Privacy Policy. In the event of material changes or if existing data is to be processed in a manner other than that specified, you will be informed in an appropriate manner.